



Re: *Figueroa v. ZZ LASHES INC, et al.*

Case 1:20-cv-04382

MEMO ENDORSED

MOTION TO DISMISS COMPLAINT

1. Plaintiff (Michelle Figueroa) and Defendant (Gurpreet Oberoi) reached a binding business and personal agreement signed in the presence of a Notary Public whereby Defendant would mentor and help establish a lash salon with the Plaintiff and Plaintiff and Defendant will have a personal relationship during this time that would be kept private. Please see attached: Evidence One: Notarized agreement between Defendant and Plaintiff.
2. Plaintiff and Defendant had an intimate relationship lasting 1-2 weeks. Not once did Plaintiff ever say or indicate in any shape or form she was not willingly and wholeheartedly participating in the personal relationship. When, on the last day of the relationship she did raise the subject, Defendant immediately stopped the relationship and never saw her again or made any attempt to ever contact her again. Evidence Two: Entire chain of text messages between Plaintiff and Defendant during their personal and work relationship.
3. Defendant is submitting further proof of Plaintiff lifestyle from her own Instagram account showing her holding thousands of dollars in cash and saying, "Payday Be Like". Not to mention other associated photo's showing Plaintiff standing in front of a Rolls Royce or holding a LV bag and saying, "So shook". Plaintiff never had any intention of following thru with the business relationship and essentially trapped the Defendant. Evidence Three: Instagram Photo's.

*Allen J. Hill
NSD*

10/1/2021

This motion is DENIED. This procedurally improper - discovery is over and the deadline for making dispositive motions has passed. It is substantively improper in that all defendant is saying is, "Plaintiff's claim is bogus and I should win." That is why we have friends. Remove the motion at Docket #40 from my list of my motion.

Your Honor's the Plaintiff case is without merit and Defendant requests the Court to Dismiss Complaint.

Respectfully submitted,

Gurpreet Oberoi
5 West 35 Street
New York, NY 10001

Gurpreet Oberoi
Sept 28, 2021